

Remarks

Claims 1-18 are pending in this application. The Examiner has withdrawn claims 4, 5, 14-16 and 18 by virtue of a restriction requirement. The remaining claims, claims 1-3, 6-13 and 17, have been rejected.

In addition, claim 8 has been objected to for including the phrase "a electrical power" in line 13, wherein the claim should recite --electrical power--. Appropriate correction has been made herein and, thus, all formal requirements are believed to have been met.

With regard to the prior art rejections, claims 1, 2, 6, 8-10 and 12 are rejected under 35 U.S.C. § 102(e) as being anticipated by *Chang* (U.S. Patent No. 6,584,695). Moreover, claims 3, 7, 11 and 17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Chang* in view of *Baines* (U.S. Patent No. 5,097,170). Lastly, claim 13 is rejected under 35 U.S.C. § 103(a) as being unpatentable over *Chang* in view of *Poet et al.* (U.S. Patent Application Publication No. 2002/0170404).

Applicants do not believe that the *Chang* reference is prior art against the subject application, as Applicants conceived this invention in a WTO country prior to the effective date of January 2, 2002. Applicants' conception is coupled with due diligence from a period of time prior to the effective date of *Chang* until the subsequent filing of the present application on January 25, 2002, establishing a constructive reduction to practice.

Attached hereto is a Declaration of the inventors under 37 C.F.R. § 1.131, attesting to their earlier conception, coupled with due diligence, from a time prior to January 2, 2002 until the subsequent filing of the present application. As evidence of the conception, attached to their Declaration are e-mails accompanied with solid model drawings illustrating the subject matter of the present invention. In addition to the solid model drawings, two-

dimensional engineering drawings of certain subject matter of the claimed invention are also included to provide further evidence of conception.

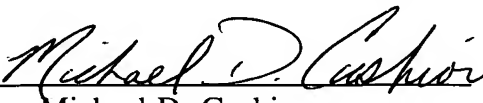
The inventors further attest that they were diligent from a time prior to January 2, 2002 up and until the subsequent filing of the present application. On December 5, 2001, a draft, as evidenced by Exhibit D of the Declaration, was supplied to the inventors for their review. On December 20, 2001, a second draft, as evidenced by Exhibit E of the Declaration, was supplied to the inventors for their review. Following review, Applicants' patent counsel incorporated necessary changes to the patent application draft and prepared it for filing with the U.S. Patent and Trademark Office, which filing was completed on January 25, 2002.

As Applicants have established conception at a date prior to January 2, 2002, coupled with due diligence from a time prior to January 2, 2002 until the subsequent filing of the present application, *Chang* is not believed to be prior art. As all the claim rejections are based on *Chang*, their withdrawal is respectfully solicited.

Applicants submit that all formal and substantive requirements for patentability have been met and that this case is now in condition for allowance. A notice to that effect is respectfully requested.

Respectfully submitted,

GERHARD JOSEPH KARL WEUSTHOF et al.

By 
Michael D. Cushion
Reg. No. 55,094
Attorney/Agent for Applicants

Date: 3/11/04

BROOKS KUSHMAN P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075-1238
Phone: 248-358-4400
Fax: 248-358-3351